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SUBJECT: Comment on draft reg guide task DG-8007 (proposed rev 1 to  
 reg guide 8.7) re instructions for recording & reporting  
 occupational radiation exposure data.

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January 24, 1992

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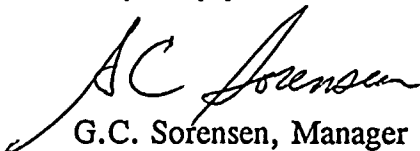
Gentlemen:

**SUBJECT: COMMENTS ON DRAFT REGULATORY GUIDE DG-8007  
(PROPOSED REVISION 1 TO REGULATORY GUIDE 8.7)**

The Washington Public Power Supply System (Supply System) has reviewed the subject draft Regulatory Guide on Instructions for Recording and Reporting Occupational Radiation Exposure Data, and provides the attached comments for your consideration.

We appreciate the opportunity to review and comment on proposed regulatory guides. Should you have any questions on our comments, please contact me at (509) 372-5238.

Very truly yours,



G.C. Sorensen, Manager  
Regulatory Programs (Mail Drop 280)

RL:sn

Attachment

cc: PL Eng, NRC  
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General Comments:

One general comment about the draft revision is that it does not provide sufficient instructions for the recording and reporting closures for "visitors." If a licensee issues a monitoring device to a visitor, is the licensee now committing to §20.1502, (Standards for Protection Against Radiation)? Further, would this commit the licensee to comply with §20.2104 (Determination of Prior Occupational Dose)? In addition, would U.S. Nuclear Regulatory Commission (NRC) Form 4, whole body count, and necessary radiation exposure briefing be necessary?

It is important to further address the subject of "visitors." Perhaps a less cumbersome approach could be achieved by issuing a generic statement which would allow licensees to handle visitors with their own internal procedures.

NRC Form 4 and NRC Form 5 have repetitious instructions. Where repetition is required on these forms, references could prove to be beneficial.

Specific Comments:

PAGE 7, SECTION 2.3

It is indicated that if an individual's TEDE is no more than 10 rems and if the total CEDE from all exposures during the current monitoring year is less than or equal to 1.2 rems, it is acceptable for licensees to leave the committed dose equivalent and organ dose equivalent spaces blank on NRC Form 5.

This appears contrary to the NRC's questions and answers for compliance to 10 CFR 20.1202 and if the external and internal exposures must be totaled when monitoring is being done as per §20.1502. The NRC answer requires summing internal and external doses anytime monitoring is being carried out by the licensee.

